

A Call to Action for Taxpayers

We paid for this research. We deserve to know how it's being used.

Why This Is Our Business

Nearly \$3 million in federal research funding — our money, appropriated through HUD — went to a small group of organizations to study offsite construction policy. Almost \$500,000 of it went to a single nonprofit, NIBS, that Congress exempted from competitive bidding in 1974. That nonprofit's own board and staff overlap with the private organization (ICC) whose standards and proprietary evaluation service the resulting research recommends expanding. None of this required a competitive process. None of it named a single competitor to the company positioned to benefit.

That's not a conspiracy theory. It's what the documents — HUD's own reports, ICC's own board minutes, NIBS's own press releases — say in their own words. The facts are public. What's missing is public attention.

What We're Asking For

- Full public accounting of how every dollar of the FY23 Offsite Construction and Land Use Reform grant was spent, deliverable by deliverable — not just the award amount, but the work product each recipient actually produced.
- A conflict-of-interest review of NIBS's and MOD X's roles in producing HUD-funded research, given the documented personnel overlap with ICC.
- Confirmation of whether any accredited competitor to ICC-ES — a company already doing this work — was ever invited to bid on any part of this funding, and if not, why not.
- A public commitment from HUD that any future "housing system certification" program will name and include competing evaluation-report providers, not just ICC-ES, before it is finalized.
- Congressional or Inspector General review of whether NIBS's sole-source statutory authority (Public Law 93-383) is being used as intended, or as a workaround to avoid competitive bidding on projects that shape national housing policy.

What You Can Actually Do

This doesn't require being an expert. It requires being loud, specific, and persistent.

- Contact your U.S. Representative and Senators. Ask them directly: did HUD run a competitive process before directing housing-certification research funding to NIBS? Ask for a written answer, not a form letter.
- Submit a FOIA request to HUD for the underlying contract, statement of work, and any correspondence between HUD, NIBS, and MOD X regarding the Research Roadmap and Action Plan reports.
- File a complaint or comment with the HUD Office of Inspector General (oig.hud.gov) if you believe federal research funds were directed in a way that avoided competition or created a conflict of interest.

- If a public comment period is open on any related rulemaking (HUD Code revisions, certification program proposals, or DOE energy code proceedings), submit a comment. These are part of the public record and are read.
- Share the documents, not just the conclusion. Point people to HUD's own reports, ICC's own board minutes, and NIBS's own press releases. Let people read the primary sources themselves.
- If you are a competitor, a small manufacturer, or an independent code official affected by this, put your experience on the record — in a public comment, a letter to your representative, or directly to HUD. Anecdote plus documentation is what moves oversight bodies to act.

What Are We Asking

It's about asking a simple question that every taxpayer has standing to ask: when public money funds research that shapes a market, does that research treat every competitor in that market fairly, or does it quietly point back to the same few organizations every time? The documents suggest the latter. The remedy is not outrage — it's daylight: public records requests, direct questions to elected officials, and comments on the record. That's how this gets fixed.

Closing

Six years of one person documenting board minutes, funding announcements, and statutory citations got this far. It shouldn't take six years, and it shouldn't take one person. This is bigger than any single builder, manufacturer, or advocate — it's about whether federal housing policy is being shaped in the open or in a loop that only a handful of people ever see. Ask the questions. Request the documents. Make the calls. That's the job now.